

FILED
U. S. DISTRICT COURT
DISTRICT OF NEBRASKA

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OFFICE OF THE CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHANNON WILLIAMS,
a/k/a Donald Jarmon, a/k/a/ Thumbs,
CHRISTOPHER PARROTT,
ANTHONY PARROTT,
JOE MARK FELIX,
DESHAWN HERNANDEZ ,
a/k/a Latreise Anderson,
VICKI CASS,
SARA JARRETT,
AMY GRIFFITH,
DANIEL BOUQUET,
YVONNE ACKERLY, and
JAMIE ACKERLY,

Defendants.

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INDICTMENT

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)(vii)
18 U.S.C. § 2
18 U.S.C. § 1956(a)(1)(A) and (B)
18 U.S.C. § 1956(h)
21 U.S. C. § 853

The Grand Jury Charges:

COUNT I

From on or about June 6, 2006, to December 14, 2009, in the District of Nebraska and elsewhere, SHANNON WILLIAMS a/k/a Donald Jarmon a/k/a Thumbs, CHRISTOPHER PARROTT, ANTHONY PARROTT, JOE MARK FELIX, DESHAWN HERNANDEZ a/k/a Latreise Anderson, VICKI CASS, SARA JARRETT, AMY GRIFFITH, DANIEL BOUQUET, YVONNE ACKERLY, and JAMIE ACKERLY, Defendants herein, knowingly and intentionally, combined, conspired, confederated and agreed with Laura Adler and with other persons, known and

unknown to the Grand Jury, to distribute and possess with intent to distribute 1,000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(vii).

In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT II

On or about January 1, 2007, through December 19, 2009, in the District of Nebraska and elsewhere, SHANNON WILLIAMS a/k/a Donald Jarmon a/k/a Thumbs, CHRISTOPHER PARROTT, VICKI CASS, DESHAWN HERNANDEZ a/k/a Latreise Anderson, and SARA JARRETT, Defendants herein, knowingly and intentionally combined, conspired, confederated and agreed with other persons known and unknown to the Grand Jury to commit the following offense against the United States of America: opening bank accounts, withdrawing funds from those accounts, and/or depositing funds into those bank accounts to launder money, knowing that the currency involved in the financial transaction represented the proceeds of some form of unlawful activity, conducted and attempted to conduct such a financial transaction involving the proceeds of specified unlawful activity, that is a conspiracy to distribute marijuana, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

In violation of Title 18, United States Code, Section 1956(h) and Title 18, United States Code, Section 2.

COUNT III

As a result of the offenses set forth in Count I, the Defendants, SHANNON WILLIAMS a/k/a Donald Jarmon a/k/a Thumbs, CHRISTOPHER PARROTT, ANTHONY PARROTT, JOE MARK FELIX, DESHAWN HERNANDEZ a/k/a Latreise Anderson, VICKI CASS, AMY GRIFFITH, YVONNE ACKERLY and JAMIE ACKERLY, shall forfeit to the United States any and all property constituting or derived from any proceeds said Defendants obtained directly or indirectly as a result of the violations alleged in Counts I and II, and any and all property used or intended to be used in any manner or part to commit and/or to facilitate the commission of the violations alleged in Counts I and II of this Indictment, including but not limited to the following:

A) UNITED STATES CURRENCY:

- 1) \$145,745.00 in United States currency recovered from Howard Kimble on February 14, 2008;
- 2) \$5,000.00 in United States currency recovered from Laura Adler on February 23, 2008;
- 3) \$175,256.84 in United States currency recovered from Julio Cesar Chiquette on October 23, 2008;
- 4) \$189,824.00 in United States currency recovered from Joe Mark Felix on September 4, 2009;

B) VEHICLES:

- 1) A 2006 Ford F-150, VIN 1FTPX14V46NB70038 registered to Yvonne and Jamie Ackerly;
- 2) A 2005 Chrysler 300C, VIN 2C3AA63H95H132560 registered to Amy Griffith;
- 3) A 1996 Mercedes Benz, Model C220, VIN WBDHA22E5T332424 registered to Ketsana Sengchan;
- 4) A 2006 Ford Extended cab truck, VIN 1FTRX12W56KD21233 registered to Amy Griffith;
- 5) A 2007 GMC Yukon, VIN 1GKFK13067J129231 registered to Deshawn Hernandez;
- 6) A 2002 BMW, VIN WBAGN63462DR06986 registered to Anthony Parrott;

- 7) A 2006 BMW 750, VIN WBAHN83516DT29217 registered to Lonnie Robinson;
- 8) A 2006 Ford Taurus, VIN 1FAFP53U06A105082 registered to Yvonne Ackerly;
- 9) A 2005 Cadillac STS, VIN 1G6DC67A950226803 registered to Collette Parrott;
- 10) A 2003 Cadillac Escalade, VIN 1GYEK63N23R220115 registered to Tiffany Turner;
- 11) A 2003 Chevrolet Tahoe, VIN 1GNEK13Z63J24252569 registered to Anthony Parrott;
- 12) A 1998 Cadillac Seville, VIN 1G6KS54Y7WU918722 registered to Anthony Parrott;

C) FINANCIAL ACCOUNTS:

- 1) Pinnacle Bank Account #6912183410 in the name of Mango Creek Properties, Inc. with a balance as of November 30, 2009, of \$24,821.95;
- 2) \$46,870. in monies delivered by Christopher Parrott now held as evidence at the Bellevue Police Department property room;
- 3) \$6,445. in monies delivered by Vicki Cass and Deshawn Hernandez now held as evidence at the Omaha Police Department property room;
- 4) Wells Fargo Bank Account #968-6623548 in the name of E Zone Investments, LLC.;

D) REAL PROPERTY:

- 1) all right, title and interest Shannon Williams and/or Vicki Cass may hold to the real property described as North 91.5 feet, West 28 feet, Lot 6, in the North 91.5 feet of Lot 7, Block 4, Parkers Addition, as surveyed, and platted in Douglas County, Nebraska, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 1923 N. 27th Street, Omaha, Nebraska;
- 2) all right, title and interest Shannon Williams may hold to the real property described as Lot 12, block 2, Hitchcocks 1st Addition, an addition to the City of Omaha, as surveyed, platted and recorded in Douglas County, Nebraska commonly known as 3744 Lake Street, Omaha, Nebraska,

as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 3744 Lake Street, Omaha, Nebraska;

3) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as 3181 Pennington CIR SW, ATL, GA, as surveyed, platted and recorded in Fulton County, Georgia, commonly known as 3181 Pennington Cir. SW, Atlanta, Georgia (titled in the name of E ZONE INVESTMENTS LLC);

4) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as HASTINGS & HEYDENS 3RD ADD LOT 14 BLOCK 0 LOTS 13 & 82X120, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 2444 Browne Street, Omaha, Nebraska;

5) all right, title and interest Shannon Williams may hold to the real property described as FAIRFAX LOT 216 BLOCK 0 40 X 134, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 3721 N. 39th Street, Omaha, Nebraska (titled in the name of MANGO CREEK PROPERTIES INC.);

6) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as MOSSMAN & WILSON ADD LOT 106 BLOCK 0 LOT 106 BLOCK 0, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 2205 N. 39th Street, Omaha, Nebraska;

7) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as WILSON -CARL C-2ND ADD LOT 20 BLOCK 0 42 X 129.2, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 4527 N. 36th Avenue, Omaha, Nebraska (titled in the name of EZONE INVESTMENTS LLC);

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8) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as FONTENELLE PARK LOT 205 BLOCK 0 40 X 130, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 3916 N. 42nd, Omaha, Nebraska (titled in the name of E ZONE INVESTMENTS LLC);


9) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as YALE PLACE LOT 49 BLOCK 0 -EX S 5 FT- 40 X 98.2, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 3365 Erksine Street, Omaha, Nebraska; (titled in the name of E ZONE INVESTMENTS LLC);

10) all right, title and interest Christopher Parrott may hold to the real property described as BOULEVARD PARK ADD LOT 7 BLOCK 9 E 40 S 30 FT & E 40 FT LOT 8 40 X 80, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 1602 Laird, Omaha, Nebraska;

In violation of Title 21, United States Code, Section 853.


A TRUE BILL


FOREPERSON


DEBORAH R. GILG
United States Attorney

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The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

A handwritten signature in black ink, reading "Maria R. Moran". The signature is written in a cursive style with a horizontal line underneath it.

MARIA R. MORAN (#17347)

Assistant U.S. Attorney